

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

ATLANTIC CASUALTY  
INSURANCE COMPANY,

Plaintiff,

v.

K&F INDUSTRIAL  
CONTRACTORS, INC. and  
SCHUFF STEEL-ATLANTIC, INC.  
f/k/a ADDISON STEEL, INC.,

Defendants.

Civil Action File  
No. 1:07CV196-MEF

**MOTION FOR EXTENSION OF TIME**

Defendant Schuff Steel-Atlantic, Inc. f/k/a Addison Steel, Inc. (herein “Schuff Steel”), with the consent of Plaintiff Atlantic Casualty Insurance Company, moves this Court to grant an extension of time through and including **April 30, 2007**, for the Defendant to answer or otherwise respond to the Complaint for Declaratory Judgment filed by Plaintiff on March 5, 2007. The response to the Complaint is now due on April 5, 2007. The short extension of time requested is needed in order for the Defendant Schuff Steel to secure local counsel and prepare an adequate response to the Complaint. Counsel for the Plaintiff has consented to the requested extension of time.

WHEREFORE, the Defendant prays that this motion be granted and that Defendant Schuff Steel have an extension through and including **April 30, 2007** to answer or otherwise respond to Plaintiff's Complaint for Declaratory Judgment.

This 28<sup>th</sup> day of March, 2007.

s/ **Thomas E. Borton, IV**

Thomas E. Borton, IV

Alabama Bar No. BOR011

Attorney for Defendant Schuff Steel-Atlantic,  
Inc. f/k/a Addison Steel, Inc.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the within and foregoing MOTION FOR EXTENSION OF TIME upon counsel of record by U.S. First Class Mail to the following:

***Counsel for Plaintiff***

Jack Owen, Esq.	Paul W. Burke, Esq.
C. Winston Sheehan, Jr., Esq.	Drew, Eckl & Farnham, LLP
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2000 Interstate Park Drive, #204	Post Office Box 7600
Montgomery, Alabama 36109-2148	Atlanta, Georgia 30357-0600

This 28<sup>th</sup> day of March, 2007.

**s/ Thomas E. Borton, IV**

Thomas E. Borton, IV

Alabama Bar No. BOR011

Attorney for Defendant Schuff Steel-Atlantic,  
Inc. f/k/a Addison Steel, Inc.

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